

**UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF MICHIGAN**

CATHOLIC CHARITIES OF
JACKSON, LENAWEE AND
HILLSDALE COUNTIES and
EMILY MCJONES,

Plaintiffs,

v.

GRETCHEN WHITMER, *et al.*,

Defendants.

Civil No. 1:24-cv-00718-JMB-SJB

**UNOPPOSED MOTION OF
THE ETHICS AND PUBLIC
POLICY CENTER FOR LEAVE
TO FILE BRIEF AS AMICUS
CURIAE IN SUPPORT OF
PLAINTIFFS**

The Ethics and Public Policy Center (“EPPC”), by and through undersigned counsel, hereby moves for leave to file a brief as amicus curiae in support of Plaintiffs and their request for a preliminary injunction. In support of this motion, EPPC respectfully shows the Court as follows:

1. Plaintiffs Catholic Charities of Jackson, Lenawee, and Hillsdale Counties *et al.* filed this action July 12, 2024.
2. On July 19, 2024, Plaintiffs filed a motion for preliminary injunction (D.E. #14).
3. Founded in 1976, EPPC is a nonprofit research institution dedicated to applying the Judeo-Christian moral tradition to critical issues of public policy, law, culture, and politics. EPPC’s programs cover a wide range of issues, including bioethics and

human flourishing, governmental and judicial restraint, personhood and identity, and religious liberty. EPPC has a strong interest in promoting the Judeo-Christian vision of the human person, upholding rights of free speech and religious liberty, and responding to the challenges of gender ideology.

4. In pursuit of its mission, EPPC works closely with Americans at all tiers of society, advising policymakers and religious leaders alike, engaging the courts and the education system, and working closely with parents and other culture-makers to apply the truth in daily life. EPPC equips Americans who cherish our founding ideals and our nation's rich Jewish and Christian heritage to think through the ethical, political, and cultural questions facing them in the twenty-first century, and find the help they need to live those truths out.
5. Gender ideology has permeated the culture with stunning speed, sowing confusion, threatening individual constitutional rights of free speech and freedom of religion, and creating an urgent need for the clear analysis and compassionate guidance EPPC provides.
6. EPPC respectfully submits that its amicus brief would be helpful in the resolution of the issues in this case because of its extensive experience studying the effects of legal requirements, including

new laws related to gender and gender identity, on the religious liberties of both individuals and entities.

7. Undersigned counsel for EPPC has consulted with counsel for all parties. Plaintiffs stated that they consent to the motion. Counsel for the Defendants stated that they will not oppose the instant motion. Therefore, this motion for leave to file is unopposed.
8. In accordance with the Court's rules, a copy of a proposed order granting this motion is attached hereto.
9. The proposed amicus brief likewise accompanies this motion.

WHEREFORE, EPPC respectfully asks for leave to file the attached brief as amicus curiae in support of Plaintiffs and their motion for preliminary injunction.

Respectfully submitted, this 9th day of August, 2024.

/s/B. Tyler Brooks
Peter Breen (Ill. Bar No. 6271981)
B. Tyler Brooks (P82567)
THOMAS MORE SOCIETY
309 W. Washington Street
Suite 1250
Chicago, IL 60606
Telephone: (312) 782-1680
Fax: (336) 900-6535
pbreen@thomasmoresociety.org
tbrooks@thomasmoresociety.org

Counsel for Amicus Curiae
Ethics and Public Policy Center

CERTIFICATE OF SERVICE

I hereby certify that on August 9, 2024, I filed a copy of the foregoing document via CM/ECF, which will send a copy to counsel of record for all parties.

SERVED:

Luke Goodrich, Esq.
Daniel Chen, Esq.
Kelly R. Oeltjenbruns, Esq.
Adele Keim, Esq.
THE BECKET FUND FOR RELIGIOUS LIBERTY
1919 Pennsylvania Ave., NW, Ste. 400
Washington, DC 20006

Counsel for Plaintiffs

Christopher M. Allen, Esq.
Daniel John Ping, Esq.
Christopher W. Braverman, Esq.
Gallant Fish, Esq.
DEPARTMENT OF ATTORNEY GENERAL
STATE OF MICHIGAN
525 W Ottawa St.
P.O. Box 30212
Lansing, MI 48909

Counsel for Defendants

Dated: August 9, 2024

/s/B. Tyler Brooks
B. Tyler Brooks (P82567)
THOMAS MORE SOCIETY
309 W. Washington St.
Suite 1250
Chicago, IL 60606
Telephone: (336) 707-8855
Fax: (336) 900-6535
tbrooks@thomasmoresociety.org